

WWR# 07895432

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS (CHICAGO)

In Re: MY RANCH, INC.

Debtor, and

Case No. 09-35697

Chapter 11

Hon. Jack B. Schmetterer

Cecelia N. Johnson,

Debtor-in-Possession /

**ROUTINE MOTION FOR RULE 2004
EXAMINATION OF THE DEBTOR**

Now comes HUNTINGTON NATIONAL BANK (“HNB”), by its attorney, Monette Cope, and requests an order authorizing it to conduct discovery pursuant to Fed. R. Bankr. P. 2004 at the offices of Weltman, Weinberg, & Reis, 180 N. LaSalle, Suite 2400, Chicago, Illinois, for the reasons stated as follows:

1. Jurisdiction over this matter is vested in this Court by virtue of 28 U.S.C. § 1334(b), IOP 15(a) of the United States District Court for the Northern District of Illinois and Local Rule 9013-9(A)(10). This is a core proceeding under 28 U.S.C. § 157(b)(2)(A).
2. Cecelia Johnson filed a petition for relief under Chapter 11 on October 5, 2009.
3. An order was entered on January 5, 2010 that Ms. Johnson’s case is to be jointly administered with My Ranch, Inc.’s Chapter 11 case.
4. The Joint Motion for Joint Administration filed in both cases on December 29, 2009 alleged that Ms. Johnson sold her all of her shares in My Ranch, Inc. to Rasheeda Oghafua in 2008, making Oghafua the sole shareholder of My Ranch, Inc.

5. Ms. Johnson signed two equipment leases as President of My Ranch, Inc. on November 7, 2008 and December 23, 2008.
6. HNB needs to investigate the circumstances surrounding the sale of Ms. Johnson's shares and her signing of the two leases with HNB in late 2008.
7. HNB needs to conduct an exam of Cecelia Johnson in order to determine whether to file a complaint for non-dischargeability under 11 U.S.C. § 523.
8. HNB further needs to examine the following documents at the time and place of the 2004 Examination:
 1. Copies of Cecelia Johnson's federal and state tax returns for the year 2007 to present.
 2. All financial statements or documents depicting Debtor Johnson's financial circumstances, prepared by any person from 2007 to present.
 3. Any and all documents relating to any joint venture, partnership, business or corporation in which Debtor Johnson has or had an interest or was or is employed from the year 2007 to present.
 4. Any and all documents relating to Debtor Johnson's income or revenue sources from 2007 to present not requested in paragraphs one, two, or three.
 5. The books and records of My Ranch, Inc. from 2007 to present.
 6. Copies of My Ranch Inc.'s federal and state tax returns for the years 2007 to the present.
 7. Any and all financial statements or documents depicting My Ranch, Inc.'s financial circumstances, prepared by any person from 2007 to present.
 8. Any and all documents, including but not limited to, corporate documents, that relate in any way to the holders of the offices of President, Vice President, Treasurer, and/or Secretary of My Ranch, Inc. from 2007 to present.
 9. Any and all documents that relate in any way, including but not limited to, corporate documents, to any transfer of shares of My Ranch, Inc. from the year 2007 to present.

Wherefore, for the reasons stated above, HUNTINGTON NATIONAL BANK requests an order authorizing it to examine debtor pursuant to Rule 2004 at the offices of Weltman, Weinberg, & Reis, 180 N. LaSalle, Suite 2400, Chicago, Illinois.

Respectfully submitted:

February 10, 2010

/s/ Monette Cope
MONETTE COPE
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